

Steven I. Adler
Todd Noshier
MANDELBAUM BARRETT PC
3 Becker Farm Road, Suite 105
Roseland, New Jersey 07068
sadler@mblawfirm.com
tnoshier@mblawfirm.com
Phone: 973-736-4600
Fax: 973-325-7467

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CC FORD GROUP WEST, LLC,

Plaintiff,

v.

JENNIFER JOHNSON, CARRIE BICKING,
BETH WEILER, PROJECT VELOCITY, INC.,
PROJECT VELOCITY PARTNERS, LLC,
MEREDITH MANNING, PHARMAESSENTIA
USA CORP., MATTHEW ORNELAS-KUH, and
JOHN DOES 1-10,

Defendants.

CASE NO. 3:22-cv-04143

*DOCUMENT ELECTRONICALLY FILED
VIA CM/ECF*

**L. CIV. R. 78.1 MOTION DAY
MAY 5, 2025**

**DECLARATION OF TODD M. NOSHER IN SUPPORT
OF PLAINTIFF'S MOTION TO DEEM DEFENDANT SERVED
UNDER FED. R. CIV. P. 4(e) and (m) OR TO EXTEND TIME TO
SERVE DEFENDANT AND APPROVE SERVICE BY ALTERNATE MEANS**

I, TODD M. NOSHER, ESQ., of full age, hereby state as follows:

1. I am an attorney at law in the State of New Jersey and Partner at the law firm of
Mandelbaum Barrett P.C.

2. I submit this Declaration in support of Plaintiff CC Ford Group West, LLC's
("Plaintiff," "CC Ford" or "CCFW") motion ("Motion") to deem Defendant Matthew Ornelas-

Kuh (“Defendant”) served under Fed. R. Civ. P. 4(e) and (m) or to extend time to serve Defendant and approve service by alternate means (“Motion”).

3. This Declaration attaches true and correct copies of certain materials referenced in Plaintiff’s Motion.

4. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiff’s May 11, 2023, Litigation Hold Letter to Defendant sent to Defendant’s then-counsel Susan Nardone, Esq.

5. Attached hereto as **Exhibit 2** are true and correct copies of additional and select correspondence between Plaintiff’s counsel and Susan Nardone, Esq.

6. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from Susan Nardone, Esq.’s November 10, 2023, letter to Plaintiff’s counsel Steven I. Adler.

7. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff’s counsel Janine Matton’s September 22, 2024, email to David Slarskey, Esq.

8. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff’s counsel Janine Matton’s September 24, 2024, email to David Slarskey, Esq.

9. Attached hereto as **Exhibit 6** is a true and correct copy of David Slarskey Esq.’s September 24, 2024, email to Plaintiff’s counsel Janine Matton.

10. Attached hereto as **Exhibit 7** is a true and correct copy of the Proof of Service of Defendant also found at Dkt. No. 143 in this Action.

11. Attached hereto as **Exhibit 8** is a true and correct copy of William O’Conner Esq.’s March 24, 2025, letter to Plaintiff’s counsel Steven I. Adler.

12. Attached hereto as **Exhibit 9** is a true and correct copy of Plaintiff’s counsel Todd Noshier’s April 3, 2025 letter to William O’Conner Esq.

13. Attached hereto as **Exhibit 10** is a true and correct copy of Plaintiff's counsel Janine Matton's October 3, 2024, service email of the Qral Subpoena to all parties in the Action.

14. Attached hereto as **Exhibit 11** are true and correct copies of social media postings and/or photographs therefrom, that are publicly available on Instagram and/or were otherwise provided to Plaintiff's counsel by Plaintiff's investigators.

15. Attached hereto as **Exhibit 12** are true and correct copies of select docket entries from *In the Estate of Virginia F. Kuh Trust*; Case No. 516,760; filed on June 6, 2023, in Probate Court No. 3 Harris County, Texas, that are publicly available at <https://www.cclerk.hctx.net/Probate.aspx>.

I declare under the laws of the United States of America that the foregoing is true and correct.

Dated: April 10, 2025

/s/ Todd M. Noshier

Todd M. Noshier
Steven I. Adler
Todd Noshier
MANDELBAUM BARRETT PC
3 Becker Farm Road, Suite 105
Roseland, New Jersey 07068
sadler@mblawfirm.com
tnoshier@mblawfirm.com
Phone: 973-736-4600
Fax: 973-325-7467

Counsel for Plaintiff